

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Clerk, U.S. District Court
Southern District of Texas
FILED

FEB 29 2012

David J. Bradley, Clerk of Court

MICHAEL TED LAMB
PLAINTIFF,

V.

RICHARD CRITES, ET AL,
DEFENDANTS.

C.A. NO. C-11-027

CR NO. 550

Plaintiff's Motion for Appointment of Counsel

To the Honorable Judge of Said Court,

Now Comes Plaintiff in the above entitled and numbered cause and files this motion. Plaintiff will show unto the Court the following:

I

On February 15, 2012 this Court set forth a Scheduling Order for this cause. A jury trial has been scheduled for December 12, 2012. The deadline for plaintiff to file a motion for counsel was set for March 2, 2012. Therefore, this motion has been timely filed.

II

Plaintiff request that this Court appoint counsel for the following reasons:

1. This cause has been set for jury trial and plaintiff is untrained and unskilled in the matters of law. Conducting a jury trial would be well above plaintiff's capabilities.
2. Defendants will be represented by the Texas Attorney General. Therefore, plaintiff would be at an extreme disadvantage without counsel.
3. Plaintiff is an indigent prisoner unable to afford counsel.
4. This case will require discovery, interrogatories, Motions In Limine, and Pre-trial Orders and Conference.
5. The appointment of counsel will benefit the Court in assuring a much smoother litigation process.
6. Counsel may be able to broker a reasonable settlement, of which plaintiff would not be opposed. Therefore, it would be in the interest of the Court to resolve this case without the time and expense of a jury trial.
7. Plaintiff's unit he resides on will have at least two 30 day lockdowns between now and the trial date. During these lockdowns it may be near impossible for plaintiff to meet the demands of the Court's Scheduling Order.

Considering the aforementioned facts Plaintiff's Motion for Appointment of Counsel should be Granted.

Respectfully Submitted,

Michael Ted Lamb

Michael Ted Lamb #790214
3001 S. Emily Dr
Beeville, TX 78102

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24th day of February, 2012.

Michael Ted Lamb

CERTIFICATE OF SERVICE

I, Michael Ted Lamb, certify that a true and correct copy of the foregoing has been served on Defendants by placing the same in the prison mail system, postage prepaid, on February 24, 2012, addressed to:

Nadine Phillpotts
Asst. Att. Gen of Texas
P.O. Box 12548
Austin, TX 78711-2548

Michael Ted Lamb 2-24-2012

Michael Ted Lamb
#790214
3001 S. Emily Dr
Beeville, TX 78102

RE: 211 CV-00027 C.R. 550

February 24, 2012

Dear Clerk,

Enclosed please find the Plaintiff's Motion for Appointment of Counsel and Certificate of Service and file with the Court.

Your assistance is appreciated.

Sincerely,

Michael Ted Lamb

Michael Lamb
790214
5001 S. Emily Dr
Brewitt, TX 78102

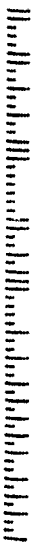
Clerk U.S. Dist. Court
1133 N Shoreline Blvd (Rm 208)
Corpus Christi, TX 78401

David J. Bradley, Clerk of Court

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